

**TIFFANY & BOSCO**  
P.A.

**SEVENTH FLOOR CAMELBACK ESPLANADE II  
2525 E. CAMELBACK ROAD  
PHOENIX, ARIZONA 85016  
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State Bar No. 010167  
Leonard J. McDonald  
State Bar No. 014228  
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Attorneys for Secured Creditor

18-00814

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF ARIZONA**

IN RE:

Michael Wayne Kennedy  
  
Debtors.

GMAT Legal Title Trust 2013-I, U.S. Bank  
National Association, as Legal Title Trustee

Secured Creditor,  
  
vs.

Michael Wayne Kennedy, Debtors; Russell Brown,  
Trustee.

Respondents.

Chapter 13

Case No. 2:19-bk-13511-BKM

**OBJECTION TO CHAPTER 13 PLAN**

IN RE: Real Property Located at  
38335 W. Montebello  
Tonopah, AZ 85353

GMAT Legal Title Trust 2013-I, U.S. Bank National Association, as Legal Title Trustee, a secured creditor, by its attorneys, TIFFANY & BOSCO, P.A., hereby objects to the proposed Chapter 13 Plan filed by the Debtor for the following reason:

1 The Chapter 13 Plan does not adequately provide for repayment of arrearages owed to Secured  
2 Creditor in the approximate amount of \$25,253.75. Secured Creditor is in the process of filing a Proof of  
3 Claim. Secured Creditor requests that the arrearages be paid through the Plan.

4 WHEREFORE, Secured Creditor prays as follows:

- 5 1. That confirmation of the proposed Chapter 13 Plan be denied;
- 6 2. For attorney's fees and costs incurred herein;
- 7 3. For such other and further relief as this Court deems just and proper.

8 DATED this 13th day of December, 2019.

9 Respectfully submitted,  
10 TIFFANY & BOSCO, P.A.

11 BY: /s/ LJM #014228  
12 Mark S. Bosco  
Leonard J. McDonald  
Attorneys for Secured Creditor

13 COPY of the foregoing mailed  
14 December 13, 2019 to:

15 Michael Wayne Kennedy  
16 P.O. Box 502  
Tonopah, AZ 85354  
17 Debtors

18 Sandra C. Oswalt  
19 300 West Clarendon Ave.  
Ste. 290  
Phoenix, AZ 85013  
20 Attorney for Debtor

21 Russell Brown  
22 3838 North Central Avenue  
Suite 800  
Phoenix, AZ 85012-1965  
23 Trustee

24 By: Jody Wilkens  
25  
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